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Request GRANTED. The Court shall permit the documents set forth below to be filed under seal on an interim basis.

June 20, 2025

Dated: June 24, 2025

New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

Via ECF

Honorable Jennifer L. Rochon
United States District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007

Re: *Shunock v. Apple Inc.*, No. 1:23-cv-08598-JLR-SLC

Dear Judge Rochon,

Plaintiff Dr. Michael Shunock writes pursuant to Rule 4.B.iii of Your Honor's Individual Rules of Practice to move that the Court grant Plaintiff leave to file the following documents under seal on an interim basis, at the request of Defendant, Apple Inc.:

- Plaintiff's Rule 56.1 Statement;
- Plaintiff's Memorandum of Law in Support of His Motion for Partial Summary Judgment;
- Sean Baldwin's Declaration in Support of Plaintiff's Motion for Partial Summary Judgment, and attached exhibits;
- Plaintiff's Memorandum of Law in Support of His Motion to Partially Exclude the Testimony of Sara D. Rinke;
- Sean Baldwin's Declaration in Support of Plaintiff's Motion to Partially Exclude the Testimony of Sara D. Rinke, and attached exhibits;
- Plaintiff's Memorandum of Law in Support of His Motion to Exclude the Testimony of Scott Klemmer; and
- Sean Baldwin's Declaration in Support of Plaintiff's Motion to Exclude the Testimony of Scott Klemmer, and attached exhibits.

As discussed with this Court at the June 18, 2025 pre-motion conference regarding the Parties' summary judgment and *Daubert* motions, Defendant has agreed to propose redacted versions of each document, and related exhibits, for the public docket within a

The Honorable Jennifer L. Rochon
June 20, 2025

reasonable timeframe. Apple will have the opportunity to justify these proposed redactions in a filing before this Court at such time it files them.

Accordingly, Dr. Shunock requests that the Court grant his motion to seal the aforementioned documents.

Sincerely,

/s/ Sean Baldwin

Sean Baldwin

Partner